

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE INTERCEPT MEDIA, INC.,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI,  
LLC, OPENAI OPCO LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION, LLC,  
OPENAI HOLDINGS, LLC, and  
MICROSOFT CORPORATION,

Defendants.

Civil Action No. 1:24-cv-01515-JSR

Hon. Jed S. Rakoff

*[Signature]*  
**[PROPOSED] ORDER GRANTING  
MOTION TO ADMIT COUNSEL *PRO*  
*HAC VICE***

The motion of MICHELLE YBARRA, for admission to practice *Pro Hac Vice* in the above captioned action is granted.

Applicant has declared that she is a member in good standing of the bar of the State of California; and that her contact information is as follows:


Michelle Ybarra  
Keker, Van Nest & Peters LLP  
633 Battery Street  
San Francisco, CA 94111-1809  
Telephone: 415-391-5400  
Facsimile: 415-397-7188  
Email: mybarra@keker.com

Applicant having requested admission *Pro Hac Vice* to appear for all purposes as counsel for Defendants OpenAI, Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC in the above-entitled action:

**IT IS HEREBY ORDERED** that Applicant is admitted to practice *Pro Hac Vice* in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

Dated: \_\_\_\_\_

4/25/24

  
\_\_\_\_\_  
Hon. Jed S. Rakoff  
United States District Judge